

BRACEWELL

September 20, 2023 (AMENDED)

VIA ECF

The Honorable Jennifer H. Rearden
United States District Judge
500 Pearl St.
Southern District of New York
New York, NY 10007-1312

Re: *United States v. Charles McGonigal*, No. 1:23-cr-00016-JHR

Your Honor,

We write as counsel for Defendant Charles McGonigal to amend an earlier request for an extension of time to provide the government a classified written summary of a supplement to the defendant's sentencing submission. We inadvertently filed a preliminary draft of that request earlier today which incorrectly requested an extension of time from September 22, 2023 until September 29, 2023 and represented that the government had consented to a week-long extension. (Dkt. 71). Mr. McGonigal is not requesting a week-long extension. Rather, Mr. McGonigal respectfully request an extension from September 22, 2023 until September 25, 2023, and counsel for the government agrees to an extension until September 25, 2023.

This request for an extension is due to the fact that cleared defense counsel recently contracted Covid-19 and does not want to expose the CISO or the defendant to unnecessary health risk. The CISO and defendant are comfortable meeting with counsel on Monday, September 25, which will allow for the safe passage of time consistent with health protocols relating to exposure to Covid.

This request is Mr. McGonigal's second request for an extension of the deadline to submit and is not made for the purposes of delay. As noted above, the government does not object to this modest extension under the circumstances.

Respectfully submitted,


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